

From: lightbodyari@aol.com  
Sent: Monday, May 29, 2006 11:45 PM  
To: NOP Livestock  
Subject: Re: Docket TM-05-14 / Comments and Answers to ANPR Questions

Hello Mr. Bradley,

My name is Ari Arom from Los Angeles, Ca, a registered voter expressing my concern regarding Docket TM-05-14. Although I am not familiar with the exact protocol of the USDA, in regards to limiting organic cow's access to pasture, I am strongly against any idea of the sort. In fact I think the USDA should make such pseudo organic milk for "the masses" illegal, as it will seriously harm the health of the environment and the drinker, and eventually myself because such people live on this earth with me.

Before I cut and paste the three questions we want "answered", again, here are an additional three of my organic standards that I feel should be implemented alongside the USDA Organic label:

A Happier Cow:

Better Than Organic Standards:

This petition states that we are willing to pay a relatively higher price for a specific line of dairy products which guarantee that:

- 1) The dairy cows are fed a wide variety of organic grains and legumes, limited soy
- 2) Dairy cows are given at least an 8 month resting period before inducing them to lactate once more.
- 3) A generous portion of the cow's milk should go to its calf.

I understand you are asking for feedback relative to the role of pasture in organic livestock production. Here are my answers to three of the most important questions the USDA would like answered.

- (1) Is the current role of pasture in the NOP regulations adequate for dairy livestock under principles of organic livestock management and

production?

No, since there are operations certified for organic dairy production that provide zero to insignificant pasture for their lactating cows, it's obvious that the current regulation is not working.

(2) If the current role of pasture as it is described in the NOP regulations is not adequate, what factors should be considered to change the role of pasture within the NOP regulations?

Minimum pasture intake should be required.

(3) Which parts of the NOP regulations should be changed to address the role of pasture in organic livestock management?

Make the following underlined changes to the federal regulations:

Â§ 205.237 Livestock feed.

(c) Ruminant livestock must graze pasture for the growing season but not less than 120 days per year. The grazed pasture must provide a significant portion of the total feed requirement but not less than 30% of the dry matter intake on an average daily basis during the growing season.

Â§ 205.239 Livestock living conditions.

(b) The producer of an organic livestock operation may provide temporary confinement for an animal because of:

(2) The animal's stage of production life; for ruminants this includes only:

(i) birthing;

(ii) dairy animals up to 6 months of age; or

(iii) beef animals during a final finishing stage not to exceed 120 days.

And I support any other specific changes recommended by The Cornucopia Institute, NODPA, MODPA, and WODPA.

Sincerely,

Ari ARom